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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KELLY J. ANDERSON,
Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.

Case No. 2:17-CV-01177-RFB-GWF

JOINT STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REVERSAL AND/OR REMAND

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for two weeks from January 24, 2018 to **February 7, 2018**. This is Defendant's fourth request for extension. Good cause exists to grant Defendant's request for extension. Additional time is required as Counsel had an unexpected death in the family and will be taking bereavement leave. Counsel also has over 75 active pending matters, of which require 2+ responses to dispositive motions per week until mid-March. In addition, Counsel has three pending Ninth Circuit matters, which require additional levels of review.

1 Counsel apologizes for the belated nature of the request, but did not expect to take unanticipated leave
2 due to the unexpected family death. As such, Counsel respectfully requests additional time to
3 adequately review the transcript and properly respond to Plaintiff's Motion for Summary Judgment.
4 Defendant makes this request in good faith with no intention to unduly delay the proceedings. The
5 parties further stipulate that the Court's Scheduling Order shall be modified accordingly.
6

7 Respectfully submitted,
8

9 Dated: January 22, 2018

/s/ *Daniel Jones
(*as authorized by email on January 22, 2018)
DANIEL JONES
Attorney for Plaintiff

13 Dated: January 22, 2018

DAYLE ELIESON
Acting United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

17 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:
22

23
24 DATED: 1/23/2018


HON. GEORGE FOLEY, JR.
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, TINA L. NAICKER, certify that the following individual was served with a copy of the **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL AND/OR REMAND** on the date and via the method of service identified below:

CM/ECF:

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Attorneys for Plaintiff

Respectfully submitted this 22nd day of January 2018,

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney